

Jamaica Station
Jamaica, NY 11435-4380
718 558-8254 Tel
718 657-9047 Fax

Phillip Eng
President

Paige Graves
Vice President, General Counsel & Secretary



Long Island Rail Road

September 18, 2020

United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312
Judge Paul A. Crotty

9/21/2020

Discovery is extended for 90 days. The September 22nd conference is adjourned to December 9, 2020 at 11:45 AM.
SO ORDERED.

Re: Frank Morfesi vs. Long Island Railroad Company
Docket No.: 20-cv-2310 (PAC) RWL
Our File No.: JN-7033

Dear Judge Crotty:

We write today requesting an extension of time within which to complete discovery. Significant paper discovery exchange has been on-going since June of this year. However, defendant has received authorizations for the treating providers on September 15, 2020. Depositions were scheduled to be conducted on September 25, 2020, but defendant will need time to process these newly received authorizations and obtain the records of each of the treating providers. We sought consent from plaintiff's office, Flynn & Wietzke, today and did not receive a response and did not want to delay the filing of the motion.

We therefore request an extension of ninety days (90) in order to obtain the relevant records, conduct depositions and designate and conduct the necessary independent medical examinations of the plaintiff. Additionally, we request the scheduled pre-trial conference be adjusted accordingly.

Thank you in advance for your courtesy and understanding.

Yours etc.,
Paige Graves, Esq.
Vice-President, General Counsel & Secretary

By Thomas L. Chiofalo
Thomas L. Chiofalo, Esq.

cc: Sean Constable, Esq.
Flynn & Wietzke, PC